

173.34 (Cylinders)



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN 19 2000

Mr. Jay Choi
Project Manager
Global Dynamics Corp.
1874 South Elmhurst Road
Mt. Prospect, IL 60056

Ref. No. 99-0213

Dear Mr. Choi:

This is in reference to your letter and our telephone conversation regarding test reports for certain acetylene cylinders that were manufactured, tested and inspected by Taylor-Wharton Coyne and purchased by your company. Your customer questioned whether the testing should have been performed by a DOT approved independent inspection agency rather than by the manufacturer. In a subsequent letter, you submitted a copy of the inspector's report for our review.

We reviewed the inspector's report for conformance with the DOT 8AL specification requirements contained in § 178.60 of the Hazardous Materials Regulations (49 CFR Parts 171-180) and find it to satisfy the requirements. Section 178.35(b) permits the inspections and verifications for cylinders manufactured to the DOT 8AL specification in the United States to be performed by a competent inspector (employee) of the manufacturer. The cylinders in question were manufactured and tested in the United States; therefore, the use of an independent inspection agency is not required.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards



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99-0213

August 4, 1999

Edward Mazzullo
Hazardous Materials Safety (DOT)
Washington, DC 20593
Tel: (800) 467-4922 x 1 Fax: (202) 366-3012

Dear Mr. Mazullo:

For the oversea project, our company purchases acetylene cylinders from a company called Taylor Wharton in Huntsville, Alabama every year. These cylinders are exported and used for manufacturing of heavy trucks. Recently, our customer requested for the test data on those cylinders based on the DOT requirement. Taylor Wharton then provided us with the test report and informed us that the testing was done by their own inspector but not in compliance with the requirement of DOT.

During the conversation with a person named Arthur in your department, I have learned that the testing based on DOT requirement is not necessary for those cylinders since Taylor Wharton is the manufacturer of these cylinders. If this is indeed true, please explain this in writing and fax/mail to us so that we can forward it to our customer. I apologize for your trouble.

If you have any questions, please feel free to call us. We really appreciate for your time and cooperation.

Sincerely,


Jay Choi
Project Manager